



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

Wilson D. Perry, Treasurer
Northwestern Mutual Life Insurance
Company Federal Political Action
Committee (NML FEDPAC)
720 East Wisconsin Avenue, Room 647
Milwaukee, WI 53202

APR 7 2000

Identification Number: C00197095

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Perry:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B supporting Line 23 of your report discloses a contribution(s) to DLCC. Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

-Schedule A supporting Line 11(a)(i) discloses contributions received through what appears to be a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year, and a statement of the amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free

number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. L. Kitchen".

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

| SCHEDULE A | | ITEMIZED RECEIPTS | | Use separate statement for each category of the District Summary Page | | PAGE | OF |
|---|--|--|--|--|--|--|----|
| Contributions from Individuals | | | | FEC FORM NO. 1100 (1992) | | | |
| <small>Any itemized receipt from a donor must be used by the committee for the purpose of reducing contributions of the committee's expenses. After that, using the name and address of any political committee to which contributions from such committee.</small> | | | | | | | |
| NAME OF COMMITTEE (in full) National Organization PAC 000000001 | | | | | | | |
| A. Full Name, Mailing Address and ZIP Code Anne Sullivan 21 10th Street City, State ZIP | | Name of Employer National Organization, Inc. Occupation Branch Manager Aggregate Year-to-Date > \$ | | This receipt, May 1992 payroll deduction \$90.00 | | Amount of Each Payment (in dollars) (\$15 biweekly) | |
| <input type="checkbox"/> Other account <input type="checkbox"/> Primary <input type="checkbox"/> General | | B. Full Name, Mailing Address and ZIP Code Rodney Jones 221 Mainbury Road City, State ZIP | | Name of Employer National Organization, Inc. Occupation Vice President Aggregate Year-to-Date > \$ | | This receipt, May 1992 payroll deduction \$120.00 | |
| <input type="checkbox"/> Other account <input type="checkbox"/> Primary <input type="checkbox"/> General | | | | \$90.00 | | (\$20 biweekly) | |

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.B(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$185—still below the \$200 itemization threshold. The manager's second-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

